

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JAMES H. GORBEY, JR., Administrator of the
ESTATE OF MARISSA ROSE FISHMAN,
deceased

Plaintiff,

CIVIL ACTION NO.: 2:04-cv-4098

V.

RICHARD LONGWILL,
and
BARBARA LONGWILL,
and
AIR BASE CARPET MART, INC.
D/B/A AIR BASE DISTRIBUTING,
INC. D/B/A AIR BASE CARPET MART
and
AIR BASE DISTRIBUTING, INC.
Defendants.

PRAECIPE TO SUBSTITUTE CORRECTED PAGE

Please submit the attached corrected page to the first page of defendants, Air Base Carpet Mart, Inc. and Air Base Distributing, Inc.'s Motion to Transfer Venue which was filed on September 7, 2004.

The corrected page requests the case to be transferred to the District of Delaware and not the District of New Jersey.

Respectfully submitted:

RAWLE & HENDERSON LLP

ECM2517

By: _____

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Delia A. Clark
Rawle & Henderson, LLP
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Attorneys for defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the within-captioned Praecepto to Substitute Corrected Page was served via first-class mail, postage prepaid, on the following:

Thomas R. Kline, Esquire
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ECM2517

Edward C. Mintzer, Jr.
Delia A. Clark

Dated: September 14, 2004.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JAMES H. GORBEY, JR., Administrator of the
ESTATE OF MARISSA ROSE FISHMAN,
deceased

Plaintiff,

CIVIL ACTION NO.: 04-cv 4098

V.

RICHARD LONGWILL,
and
BARBARA LONGWILL,
and
AIR BASE CARPET MART, INC.
D/B/A AIR BASE DISTRIBUTING,
INC. D/B/A AIR BASE CARPET MART
and
AIR BASE DISTRIBUTING, INC.
Defendants.

**DEFENDANTS, AIR BASE CARPET MART, INC. AND
AIR BASE DISTRIBUTING, INC.'S
MOTION TO TRANSFER VENUE**

Defendants, Air Base Carpet Mart, Inc. and Air Base distributing, Inc., by and through their attorneys, Rawle & Henderson LLP, hereby move for the transfer of this case to the District of Delaware pursuant to 28 U.S.C. § 1404(a), for the reason set forth below and in the attached Memorandum of Law and Affidavit:

1. Plaintiff commenced a civil action in the Court of Common Pleas in Philadelphia County on or about March 16, 2004. Preliminary Objections for lack of personal jurisdiction were filed on behalf of Air Base Carpet Mart, Inc. on April 12, 2004.

2. Plaintiff filed an amended complaint which changed little substantively of the complaint. A second set of preliminary objections were filed on May 25, 2004. Plaintiff responded by filing a second amended complaint. Again, defendants raised objections asserting